

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**



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Rulemaking No. 20-08-020
(Filed August 27, 2020)

Order Instituting Rulemaking to Revisit Net
Metering Tariffs Pursuant to Decision 16-01-044,
and to Address Other Issues Related to Net Energy
Metering

**REPLY COMMENTS OF REDWOOD COAST ENERGY AUTHORITY
ON THE ADMINISTRATIVE LAW JUDGE'S RULING SETTING ASIDE
SUBMISSION OF THE RECORD TO TAKE COMMENT ON A LIMITED BASIS**

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Dated: July 1, 2022

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Redwood Coast Energy Authority (“RCEA”) submits these reply comments in response to opening comments filed in response to the *Administrative Law Judge’s Ruling Setting Aside Submission of the Record to Take Comment on a Limited Basis* (“Ruling”), issued on May 9, 2022.

I. Introduction

On June 10th, 2022, East Bay Community Energy, RCEA, San Diego Community Power, and Peninsula Clean Energy (together, “Joint CCAs”) submitted opening comments filed in response to the Ruling. RCEA continues to support the positions put forth in the Joint CCAs’ opening comments, with a slight deviation in stance regarding the Tariff’s treatment of non-bypassable charges (“NBCs”) due to local input received from RCEA customers and other local stakeholders. RCEA’s revised perspective is described below.

II. Non-Bypassable Charges on Gross Consumption

RCEA joins a diverse set of parties who submitted opening comments expressing opposition to levying NBCs on Tariff customers' gross consumption. This diverse set of parties includes agricultural consumers, climate advocacy groups, environmental health organizations, conservation organizations, affordability advocates, as well as the solar and storage industry. RCEA posits that NBCs should continue to be applied only to kWh imported from the grid. RCEA joins others in opposing the collection of NBCs on gross consumption for the following reasons:

- Collecting NBCs on gross consumption discourages behavior that will help meet various local and State goals by discouraging the production, storage, and consumption of clean energy on-site.¹
- Collecting NBCs on gross consumption from Tariff customers is inappropriate because the on-site-consumed BTM renewable power is unrelated to the costs sought to be recovered by the NBCs² and does not result in drawing any energy or services from the grid/utilities.³
- The methodology proposed to bill customers on estimated gross consumption would yield inaccurate billing. Alternatively, requiring installation of a separate meter to accurately track consumption necessary to levy NBCs on gross consumption would be expensive and unreasonable.⁴
- RCEA notes that many parties contest or otherwise express great concern

¹ See opening comments submitted by CBD, Environmental Working Group, PowerFlex, and 350 Bay Area.

² See opening comments submitted by SBUA, SEIA and Vote Solar.

³ See opening comments submitted by Aurora Solar, CALSSA, PCF and PosiGen.

⁴ See opening comments submitted by Aurora Solar, Ivy Energy, and SBUA.

regarding the legality of this proposed policy, stating that the CPUC does not and should not have the jurisdiction necessary to levy these charges on behind-the-meter solar usage.⁵

III. Conclusion

RCEA thanks the Commission and stakeholders for their consideration of these Comments.

Respectfully submitted,

/s/ Aisha Cissna

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Regulatory and Legislative Policy Manager
Redwood Coast Energy Authority

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⁵ See opening comments submitted by AECA, Aurora Solar, CALSSA, CESA, County of Los Angeles, Environmental Working Group, PosiGen, SEIA and Vote Solar.